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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF LAS VEGAS, NEVADA**

JOHN MCGRAW,)
Plaintiff,)
)
vs.)
)
CHARLES KIM, individually;)
LINDEN HOSPITALITY, LLC; FIRST)
AMERICAN)
TITLE INSURANCE COMPANY;)
LHP RIVERHOUSE HOLDING, LLC;)
DOES IX, and ROE CORPORATIONS)
I-X, inclusive,)
Defendants)

CASE NO. 2:22-cv-01414-APG-NJK

**STIPULATION AND ORDER EXTENDING
TIME FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT FIRST
AMERICAN TITLE INSURANCE
COMPANY'S MOTION FOR AWARD OF
ATTORNEY'S FEES AND COSTS OF
LITIGATION AGAINST PLAINTIFF JOHN
MCGRAW**

Plaintiff JOHN MCGRAW, Defendants CHARLES KIM, individually; LINDEN HOSPITALITY, LLC and FIRST AMERICAN TITLE INSURANCE COMPANY, by and through their undersigned counsel, hereby agree to extend the time for Plaintiff to file response to Defendant First American Title Insurance Company's motion for award of attorney's fees and costs of litigation against Plaintiff John McGraw up to and including February 28, 2025, as set out herein below.

Date: February 21, 2025

/s/ Paul W. Chandler

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I.
INTRODUCTION AND STATEMENT OF FACTS

Defendant First American Title filed its Motion for Summary Judgment which was Granted on January 21, 2025. [ECF No. 96]. On February 4, 2025, First American Title filed a motion seeking an award of attorney's fees and costs of litigation. [ECF No. 111]. The parties are presently attempting to resolve these matters informally and previously stipulated to extend the time for Plaintiff to file his response/opposition to the motion of First American Title until and including February 21, 2025. Another extension of time for one week, up to and including February 28, 2025, is necessary so that the parties can continue their discussions to resolve this matter before being required to file a response/opposition to the subject motion.

This extension request is made in good faith, jointly by the parties, and not for the purposes of delay. Moreover, since this request is a joint request, no party will be prejudiced by granting the extension. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension. Nothing contained herein shall be deemed an admission or waiver of any right belonging to any party hereto.

WHEREFORE, the parties respectfully request that this Court extend the aforementioned period as requested.

IT IS SO STIPULATED:

DATED this 21st day of February 2025.

/S/ John M. Langevele

John M. Langeveld, Esq.

Gerrard Cox Larsen

2450 St. Rose Pkwy., Ste. 200 Henderson, NV 89074

Telephone: (702) 796-4000

Attorneys for First American Title Insurance Company

1 DATED this 21st day of February 2025.

2
3 /s/ **Paul W. Chandler**

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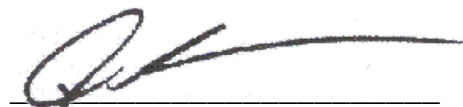
12 DATED this 21st day of February 2025

13
14 /S/ **Tyler N. Ure**

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16 Nevada Bar No. 11730
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23 Attorneys for Defendants, CHARLES KIM
24 and LINDEN HOSPITALITY

25
26 IT IS SO ORDERED:

27 Dated: February 26, 2025



ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE